

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP, in his personal capacity,

*Defendant.*

No. 20 Civ. 7311 (LAK) (JLC)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF  
PLAINTIFF E. JEAN CARROLL'S OPPOSITION  
TO DONALD J. TRUMP'S OMNIBUS MOTION IN LIMINE

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's opposition to Defendant Donald J. Trump's motion in limine.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the official transcript of Natasha Stoyloff's deposition, which was taken in this action on October 13, 2022.

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the official transcript of Jessica Leeds' deposition, which was taken in this action on October 13, 2022.

5. **Exhibit 3** is Exhibit PX-25 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the official transcript of Donald J. Trump's deposition, which was taken in this action on October 19, 2022.

7. **Exhibit 5** is Exhibit PX-26 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

8. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the official transcript of E. Jean Carroll's deposition, which was taken in this action on October 14, 2022.

9. **Exhibit 7** is Exhibit PX-27 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

10. **Exhibit 8** is Exhibit PX-28 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

11. **Exhibit 9** is Exhibit PX-29 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

12. **Exhibit 10** is Exhibit PX-30 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

13. **Exhibit 11** is Exhibit PX-31 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

14. **Exhibit 12** is Exhibit PX-32 as identified in the parties' Joint Pretrial Order, ECF 129, which is being submitted to the Court via CD.

15. Attached hereto as **Exhibit 13** is Exhibit PX-1 as identified in the parties' Joint Pretrial Order, ECF 129, which is a true and correct copy of a tweet containing the statement that Trump made about Carroll on June 21, 2019.

16. Attached hereto as **Exhibit 14** is Exhibit PX-2 as identified in the parties' Joint Pretrial Order, ECF 129, which is a true and correct copy of the transcript containing the statement that Trump made about Carroll on June 22, 2019.

17. Attached hereto as **Exhibit 15** is Exhibit PX-3 as identified in the parties' Joint Pretrial Order, ECF 129, which is a true and correct copy of the June 24, 2019 Hill article containing the statement that Trump made about Carroll.

18. Attached hereto as **Exhibit 16** is Exhibit PX-4 as identified in the parties' Joint Pretrial Order, ECF 129, which is a true and correct copy of a Truth Social post containing the statement Trump made about Carroll on October 12, 2022.

Dated: New York, New York  
February 23, 2023



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Roberta A. Kaplan